

AVENATTI & ASSOCIATES, APC
Michael J. Avenatti, State Bar No. 206929
Ahmed Ibrahim, State Bar No. 238739
520 Newport Center Drive, Suite 1400
Newport Beach, CA 92660
Telephone: 949.706.7000
Facsimile: 949.706.7050

Attorneys for Plaintiff Stephanie Clifford
a.k.a. Stormy Daniels a.k.a. Peggy Peterson

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

STEPHANIE CLIFFORD a.k.a.
STORMY DANIELS a.k.a. PEGGY
PETERSON, an individual,

Plaintiff,

VS.

DONALD J. TRUMP a.k.a. DAVID DENNISON, an individual, ESSENTIAL CONSULTANTS, LLC, a Delaware Limited Liability Company, MICHAEL COHEN and DOES 1 through 10, inclusive.

Defendants.

CASE NO.: 2:18-cv-02217-SJO-FFM

**SUPPLEMENTAL DECLARATION
OF MICHAEL J. AVENATTI IN
SUPPORT OF PLAINTIFF
STEPHANIE CLIFFORD'S
COMBINED OPPOSITION TO
MOTIONS TO DISMISS FOR LACK
OF SUBJECT MATTER
JURISDICTION FILED BY
DEFENDANTS DONALD J. TRUMP
AND ESSENTIAL CONSULTANTS
LLC**

DECLARATION OF MICHAEL J. AVENATTI

I, MICHAEL J. AVENATTI, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an attorney with the law firm of Avenatti & Associates, APC, counsel of record for Plaintiff Stephanie Clifford. I am submitting this supplemental declaration in support of Plaintiff Stephanie Clifford's Combined Opposition to Motions to Dismiss for Lack of Subject Matter Jurisdiction Filed by Defendants Donald J. Trump and Essential Consultants LLC. I have personal knowledge of the information stated herein and if called to testify to the same would and could do so.

2. This declaration is being submitted in advance of the hearing on Defendants' motions to dismiss for lack of subject matter jurisdiction, which is currently scheduled for January 22, 2019 at 2:00 p.m. The information attached to this declaration is relevant to the Court's determination of these motions.

3. Attached hereto as Exhibit W is a true and correct copy of the Government's Sentencing Memorandum filed in relation to the sentencing of Michael Cohen, which includes information concerning Mr. Cohen's confessed campaign finance crimes for the payment to Plaintiff and admission that he acted in coordination with and at the direction of Mr. Trump. This document was filed in the United States District Court for the Southern District of New York in the criminal matter styled United States v. Michael Cohen, Case No. 1:18-cr-00602-WHP.

4. Attached hereto as Exhibit X is a true and correct copy of the transcript of the December 12, 2018 sentencing hearing in the Southern District of New York for Mr. Cohen in United States v. Cohen. Mr. Cohen's statement to the Court is found on pages 26 to 30 of the transcript.

5. After his sentencing, Mr. Cohen was interviewed on camera by ABC News Chief Anchor George Stephanopoulos. Portions of the interview aired on *Good Morning America*. A true and correct copy of the transcript from this interview, obtained from the Internet, is attached hereto as Exhibit Y. The transcript, along with video footage of the

1 interview, may be viewed at <https://abcnews.go.com/Politics/michael-cohen-talks-george->
2 [stephanopoulos-transcript/story?id=59816305.](#)

3 I declare, under penalty of perjury and under the laws of the United States of
4 America, that the foregoing is true and correct. Executed this 17th day of December,
5 2018.

6 _____
7 /s/ Michael J. Avenatti
Michael J. Avenatti

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28